

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE,

Plaintiff,

v.

**WARREN & BARAM MANAGEMENT
LLC,**

Defendant.

Case No. 1:20-cv-09522-ER/DCF

DECLARATION OF F. FRANKLIN AMANAT

I, F. Franklin Amanat, do solemnly declare under penalties of perjury pursuant to 28 U.S.C. § 1746, as follows, in support of Plaintiff Jane Doe's Order to Show Cause:

1. I am counsel of record for Plaintiff, Jane Doe, in this action. I am a Partner with DiCello Levitt Gutzler and a member in good standing with the State Bar of New York. I have been admitted to practice before the United States District Court for the Southern District of New York.

2. I have personal knowledge of the facts stated herein, and if called upon to do so, could and would testify competently thereto.

3. This morning, beginning around approximately 6:40 a.m., I began to receive emails from Jonathan Baram, acting as the principal officer of Defendant Warren & Baram Management LLC, and using the email address jonathan@warrenandbaram.com, with the subject heading, "I promise you." See Exhibit A attached hereto. These emails were sent to me, to four of my partners (Greg Gutzler, Adam Levitt, Mark DiCello, and Amy Keller), to my associate Justin Hawal, to my paralegal Lisa Lucas, and to my co-counsel Lisa Haba. Baram sent these emails approximately

every 5-10 seconds for more than 45 minutes before I finally succeeded in blocking his email address – in total well over 120 emails.

4. The emails were virtually identical, in that the body text was verbatim the same, while Baram changed the subject line a few times during the onslaught.

5. In the body of each of the emails, the words “I promise you” were repeated continuously almost a hundred times. In addition, the email contained the following phrases: “I promise you that you will never get one fucking penny for me”; “I promise you I will take my revenge And sue you endlessly and ruin your career and your life like you tried to do with me But you did not succeed you loser”; I promise you you’ll regret the day you ever fuck with me”; and I promise you that I will never ever ever go away.” *Id.* One of the alternate subject lines was “We are building a team of attorneys to destroy you.”

6. The emails, as evidenced by their very nature, are threatening, harassing, abusive, and inappropriate.

7. Baram’s emails are further evidence of the requested relief sought by Plaintiff, including sanctions and a temporary restraining order prohibiting Baram from continuing his barrage of retaliatory and obscene threats.


F. Franklin Amanat